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11 *Attorneys for Plaintiff*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 NAVAJO HEALTH FOUNDATION – SAGE
15 MEMORIAL HOSPITAL, INC. (doing
business as “Sage Memorial Hospital”); an
16 Arizona non-profit corporation,

17 Plaintiff,

18 vs.
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20 RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
21 (doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually,
22 TAUSIF HASAN; individually, DOES 1-10;
23 ROES A-Z;

24 Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND
PLAINTIFF’S TIME TO RESPOND TO
DEFENDANTS’ MOTIONS TO DISMISS
[ECF #46] AND TO STRIKE [ECF #47]
THE COMPLAINT
(FIRST REQUEST)**

1 Pursuant to Federal Rule of Civil Procedure 6 and the Court's Local Rule of Civil
2 Practice 7-1, the parties hereby stipulate to provide Plaintiff to and until July 20, 2020 to
3 respond to Defendants' motion to dismiss¹ and motion to strike,² both of which are currently
4 pending before the Court. The parties respectfully request that the Court approve this
5 stipulation. This is the parties' first request for an extension of time regarding this matter (i.e.
6 Defendants' motions filed on June 5, 2020).

7 Following communication between counsel for the respective parties, this stipulation is
8 agreed to based upon undersigned counsel's current workload and the arguments raised in the
9 pending motions. Undersigned counsel, who is taking the lead on responding to the pending
10 motions for Plaintiff, herein represents that additional time is needed to prepare an appropriate
11 response to the pending motions while balancing his other case commitments. Specifically,
12 within the past two weeks, undersigned counsel has had to prepare for and attend an "ENE"
13 session in this federal court, respond to discovery in three separate civil matters and assist with
14 matters pertaining to a federal criminal case. Thus, undersigned counsel will need the
15 additional time to prepare responses, share those with co-counsel and finalize them for filing.

16 Following communications on this matter, the parties agree to provide Plaintiff to and
17 until July 20, 2020 to respond to Defendants' pending motions which were earlier filed on June
18 5, 2020. The parties respectfully request that the Court approve this stipulation.

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24 ¹ See ECF #46.

25 ² See ECF #47.

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Respectfully submitted,

/s/ Brian L. Bradford

/s/ Paul S. Padda

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Counsel for Defendants

Counsel for Plaintiff

Dated: June 15, 2020

Dated: June 15, 2020

IT IS SO ORDERED:

The parties' joint stipulation is hereby approved. Plaintiff shall have until July 20, 2020 to respond to Defendant's motion to dismiss (ECF No. 46) and motion to strike (ECF No. 47).



**Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT**

Dated this 17 day of June, 2020.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, June 15, 2020, a copy of the foregoing document was served upon all counsel of record in this matter through the Court's CM/ECF system.

/s/ Paul S. Padda

Paul S. Padda